

## **EXHIBIT D**

DONNA K. SOUTTER v. EQUIFAX INFORMATION SERVICES  
VICARI, PAMELA on 08/28/2013

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1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE EASTERN DISTRICT OF VIRGINIA  
3                   RICHMOND DIVISION

4           DONNA K. SOUTTER, for herself  
5           and on behalf of all similarly  
6           situated individuals,

7                               Plaintiff,

8                               v.

Civil Action No.  
3:10-cv-00107

9           EQUIFAX INFORMATION SERVICES,  
10           LLC,

11                               Defendant.

12  
13                   DEPOSITION OF PAMELA VICARI

14  
15                               August 28, 2013

16                               Richmond, Virginia

17  
18  
19  
20  
21  
22                   HALASZ REPORTING & VIDEOCONFERENCE  
23                               P.O. Box 1644  
24                               Richmond, Virginia 23218-1644  
25                               (804) 708-0025

Reported by: Lori Jo Krenik, CCR, RPR, CRR

1 Q And have you produced those e-mails to  
2 Mr. Raether?

3 A I did not have any when he asked for them.  
4 I think I have one in there now from this week.

5 Q And what do you put in those e-mails? Are  
6 those e-mails from LexisNexis?

7 A That's correct, from my territory person  
8 sent it to me, Demi.

9 Q Have you ever been responsible for  
10 gathering for LexisNexis or in this eight-year period,  
11 Choice Point, LexisNexis, have you ever been  
12 responsible for obtaining vacates or satisfactions  
13 other than when a consumer makes a specific dispute to  
14 you?

15 A Was I asked to do that?

16 Q Yes.

17 A Yes.

18 Q When were you asked to do it?

19 A When I worked for I believe it was Choice  
20 Point we were asked to go in to see if they would  
21 print a report of the satisfactions in our courts so we  
22 went in to talk to the district court to see if they  
23 could print that out for us monthly.

24 Q And did they print it out for you monthly?

25 A Two of my courts would do it.

1 Q Which court?

2 A Hanover and Henrico.

3 Q And anyone else?

4 A No.

5 Q So how would you obtain any of that  
6 information?

7 A If I went into LOPAS and there was a  
8 judgment and the judgment was released, it would be  
9 typed as a release and not a judgment.

10 Q All right. But that would only be new  
11 judgments that you were collecting; right?

12 A Correct.

13 Q You wouldn't ever go back and check  
14 previous judgments?

15 A I was not allowed to go through the court  
16 records.

17 Q What do you mean, not allowed to?

18 A In a district court, before the public  
19 access computers, you would have to go through their  
20 files, and you weren't allowed to go behind the  
21 counter and go through their files.

22 Q But if you were in LOPAS, the only  
23 activity that you would do in LOPAS absent a specific  
24 consumer dispute, a CDV, the only activity that you  
25 would do in LOPAS during this entire period, eight